

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re)	Chapter 11
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Case No. 12-12020 (MG)
)	
Debtors.)	Jointly Administered
_____)	

**NOTICE OF MOTION IN LIMINE OF THE NOTES TRUSTEE AND
AD HOC COMMITTEE TO EXCLUDE TESTIMONY REGARDING
THE REBUTTAL EXPERT REPORT OF GINA GUTZEIT**

PLEASE TAKE NOTICE that UMB Bank, N.A., as successor Notes Trustee (in such capacity, the “Notes Trustee”) under that certain Indenture dated as of June 6, 2008 for 9.625% Junior Secured Guaranteed Notes due 2015 of Residential Capital, LLC and the Ad Hoc Committee of Junior Secured Noteholders (the “Ad Hoc Committee,” and together with the Notes Trustee, the “JSNs”), by and through their undersigned counsel, will move before the United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court, One Bowling Green, New York, NY 10004, at a date and time to be set by the Court, for an order granting the JSNs’ Motion in Limine to Exclude Testimony Regarding the Rebuttal Expert Report of Gina Gutzeit.

Dated: November 12, 2013
New York, New York

WHITE & CASE LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Telephone: (212) 819-8200
Facsimile: (212) 354-8113
J. Christopher Shore
Harrison L. Denman

- and -

By: /s/ Gerard Uzzi
MILBANK, TWEED, HADLEY &
M^cCLOY LLP
1 Chase Manhattan Plaza
New York, New York 10005
Telephone: (212) 530-5000
Facsimile: (212) 530-5219
Gerard Uzzi
David S. Cohen
Daniel M. Perry
Atara Miller

*Attorneys for the Notes Trustee and Ad Hoc
Committee*